

# WILLIAMS · BRADBURY

A T T O R N E Y S   A T   L A W

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IDAHO PUBLIC  
UTILITIES COMMISSION

September 7, 2016

Ms. Jean Jewell  
Commission Secretary  
Idaho Public Utilities Commission  
472 W. Washington  
Boise, ID 83702

Re: PAC-E-16-12

Dear Ms. Jewell:

Please find enclosed the original and seven copies of Petition of Pacificorp Idaho Industrial Customers for Leave to Intervene for filing in the above referenced case.

Thank you for your assistance in this matter. Please feel free to give me a call should you have any questions.

Sincerely,



Ronald L. Williams

RLW/jr  
Enclosures

Ronald L. Williams, ISB No. 3034  
Williams Bradbury, P.C.  
1015 W. Hays St.  
Boise ID, 83702  
Telephone: 208-344-6633  
Fax: 208-344-0077  
ron@williamsbradbury.com

Attorneys for PIIC

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IDAHO PUBLIC  
UTILITIES COMMISSION

**BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION**

IN THE MATTER OF THE APPLICATION )  
OF ROCKY MOUNTAIN POWER TO )  
UPDATE BASE NET POWER COSTS AND )  
IMPLEMENT A RATE STABILITY PLAN )  
\_\_\_\_\_ )

Case No. PAC-E-16-12

PETITION OF PACIFICORP IDAHO  
INDUSTRIAL CUSTOMERS  
FOR LEAVE TO INTERVENE

Pursuant to Rules 71 and 73 of the Idaho Public Utilities Commission's Rules of Practice and Procedure, PacifiCorp Idaho Industrial Customers ("PIIC") petitions the Idaho Public Utilities Commission (the "Commission") for leave to intervene. In support of this Petition, PIIC states as follows:

1. The name and address of PIIC is:

PacifiCorp Idaho Industrial Customers  
c/o Williams Bradbury, P.C.  
1015 W. Hays St,  
Boise, ID 83702

2. PIIC will be represented in this proceeding by Williams Bradbury, P.C.

All documents relating to these proceedings should be served on the following persons at the addresses listed:

Ronald L. Williams  
Williams Bradbury, P.C.  
1015 W. Hays St.  
Boise ID, 83702  
Telephone: 208-344-6633  
Facsimile: 208-344-0077  
E-mail: [ron@williamsbradbury.com](mailto:ron@williamsbradbury.com)

Val Steiner  
Agrium Us Inc./Nu-West Industries  
3010 Conda Rd  
Soda Springs, ID, 83276-5301  
E-mail: [val.steiner@agrium.com](mailto:val.steiner@agrium.com)  
[ELECTRONIC COPY ONLY]

Jim Duke  
Idahoan Foods  
357 Constitution Way  
Idaho Falls, ID 83742  
E-mail: [jduke@idahoan.com](mailto:jduke@idahoan.com)  
[ELECTRONIC COPY ONLY]

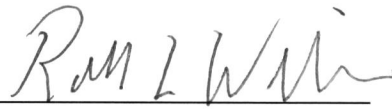
3. PIIC is a coalition of Idaho companies that are industrial customers of Rocky Mountain Power ("RMP"). RMP's application to update base net power costs and implement a rate stability plan impacts PIIC members. PIIC has a direct and substantial interest in this proceeding that will not be adequately represented by any other party, and may be affected by any Commission determination made in connection with these proceedings. PIIC intends to participate in all respects of this proceeding and will not unreasonably broaden the issues, burden the record, or delay this proceeding.

4 Without the opportunity to intervene herein, PIIC would be without a manner or means of participating in the lawful determination of issues which will result in affecting the rates for electric service to the PIIC members.

WHEREFORE, PIIC respectfully requests that the Commission grant its petition to intervene with full party status in this proceeding and to appear and participate in all matters as may be necessary and appropriate; and to present evidence, call and examine witnesses, cross-examine witnesses, present argument, and to otherwise fully participate in the proceedings.

Dated this 7<sup>th</sup> day of September, 2016.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Ron L Williams", written over a horizontal line.

Ronald L. Williams  
Williams Bradbury, P.C.  
Attorneys for PIIC

### CERTIFICATE OF MAILING

I HEREBY CERTIFY that on this 7<sup>th</sup> day of September, 2016, I caused to be served a true and correct copy of the foregoing document upon the following individuals in the manner indicated below:

Ted Weston  
**Rocky Mountain Power**  
201 South Main, Suite 2300  
Salt Lake City, UT 84111  
E-Mail: ted.weston@pacificorp.com

- ☐ Hand Delivery
- ☐ US Mail (postage prepaid)
- ☐ Facsimile Transmission
- ☐ Federal Express
- ☒ Electronic Transmission

Daniel E. Solander  
**Rocky Mountain Power**  
201 South Main, Suite 2300  
Salt Lake City, UT 84111  
E-Mail: Daniel.solander@pacificorp.com

- ☐ Hand Delivery
- ☐ US Mail (postage prepaid)
- ☐ Facsimile Transmission
- ☐ Federal Express
- ☒ Electronic Transmission

Randall C. Budge  
Racine Olson Nye Budge & Bailey, Chtd.  
201 E. Center  
PO Box 1391  
Pocatello, ID 83204-1391  
E-Mail: rcb@racinelaw.net  
Attorney for **Monsanto Company**

- ☐ Hand Delivery
- ☐ US Mail (postage prepaid)
- ☐ Facsimile Transmission
- ☐ Federal Express
- ☒ Electronic Transmission

Katie Iverson  
Brubaker & Associates  
17244 W. Cordova Court  
Surprise, AZ 85387  
E-Mail: kiverson@consultbai.com  
**Monsanto Company**

- ☐ Hand Delivery
- ☐ US Mail (postage prepaid)
- ☐ Facsimile Transmission
- ☐ Federal Express
- ☒ Electronic Transmission

Eric L. Olson  
Racine Olson Nye Budge & Bailey, Chtd.  
201 E. Center  
PO Box 1391  
Pocatello, ID 83204-1391  
E-Mail: elo@racinelaw.net  
Attorney for **Idaho Irrigation Pumpers Association**


- ☐ Hand Delivery
- ☐ US Mail (postage prepaid)
- ☐ Facsimile Transmission
- ☐ Federal Express
- ☒ Electronic Transmission

Val Steiner (e-mail only)  
Agrium Us Inc.,/Nu-West Industries  
3010 Conda Rd  
Soda Springs, ID, 83276-5301  
E-mail: [val.steiner@agrium.com](mailto:val.steiner@agrium.com)  
**PIIC**

☒ Electronic Transmission

Jim Duke (e-mail only)  
Idahoan Foods  
357 Constitution Way  
Idaho Falls, ID 83742  
E-mail: [jduke@idahoan.com](mailto:jduke@idahoan.com)  
**PIIC**

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Ronald L. Williams